

Sage Legal LLC

18211 Jamaica Avenue • Jamaica, NY 11423-2327 • (718) 412-2421 • emanuel@sagelegal.nyc

February 13, 2025

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. James M. Wicks, U.S.M.J.
100 Federal Plaza, Courtroom 1020
Central Islip, NY 11722-4438

Re: Lewis v. DL Greenvale LLC
Case No.: 2:24-cv-4321 (JMW)

Dear Judge Wicks:

This firm represents the Defendant in the above-referenced case, who respectfully submits this joint status report concerning the status of the parties' settlement. The settlement agreement has been fully executed, with one final change in the terms negotiated today. The parties expect to submit a stipulation of voluntary dismissal by Friday, February 21, 2025.

The parties apologize to the Court for their inability to sooner send a joint status report. The delay stemmed from deadlines and appearances in other matters, and the need to negotiate some of the more minute terms of the parties' settlement agreement which took additional time to finalize. Still, the parties are mindful that they should have responded to the prior Orders issued by this Court and regret that they were unable to do so. In light of the joint status report, and given the lenient standard under Rule 6 of the Federal Rules of Civil Procedure permitting extensions of time when a reasonable excuse for the delay is presented along with the existence of excusable neglect, the parties respectfully jointly request that the conference scheduled for Wednesday, February 19, 2025 be adjourned in contemplation of the parties' anticipated filing of the stipulation of voluntary dismissal by Friday, February 21, 2025. See Fed. R. Civ. P. 6(b)(1)(B).

We thank this honorable Court for its time and attention to this case.

Dated: Jamaica, New York
February 13, 2025

Respectfully submitted,

SAGE LEGAL LLC

By: /s/ Emanuel Kataev, Esq.

Emanuel Kataev, Esq.
18211 Jamaica Avenue
Jamaica, NY 11423-2327
(718) 412-2421 (office)
(917) 807-7819 (cellular)
(718) 489-4155 (facsimile)
emanuel@sagelegal.nyc

Attorneys for Defendant
DL Greenvale LLC

VIA ECF

Phillips & Associates, Attorneys at Law, PLLC

Attn: Joshua M. Friedman, Esq.

585 Stewart Avenue, Suite 410

Garden City, NY 11530-4701

jfriedman@tpglaws.com

Attorneys for Plaintiff

Alicia Lewis